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9 *ex rel. its Department of Corrections*

10 UNITED STATES DISTRICT COURT  
11 DISTRICT OF NEVADA  
12

13 MARDELLE PETERSEN,

14 Plaintiff,

15 v.

16 THE STATE OF NEVADA, *ex rel. its*  
17 NEVADA DEPARTMENT OF  
CORRECTIONS,

18 Defendant.  
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Case No. 3:20-cv-00201-RCJ-WGC

**STIPULATION AND ORDER**  
**EXTENDING TIME TO ANSWER OR**  
**OTHERWISE RESPOND TO**  
**PLAINTIFF'S COMPLAINT**

**(SECOND REQUEST)**

21 Defendant, State of Nevada *ex rel. its* Department of Corrections ("NDOC"), and  
22 Plaintiff, Mardelle Petersen, by and through undersigned counsel, pursuant to LR IA 6-1 and LR  
23 IA 6-2, hereby submit their Stipulation, Request, and Order Extending Time to Answer or  
24 Otherwise Respond to Plaintiff's Complaint. This is the second request for an extension of time  
25 to file an answer or otherwise respond to Plaintiff's Complaint.

26 Plaintiff, Mardelle Petersen, filed a Complaint (ECF No. 1) on April 2, 2020. Defendant  
27 was served with the Complaint on April 6, 2020, and the Attorney General was served on April  
28 8, 2020. The deadline for Defendant to answer or otherwise respond to the Complaint was April

1 27, 2020. Defendant was granted an extension to and including Thursday, May 28, 2020, to file  
2 a responsive pleading (ECF No. 6).

3 Despite this previous extension, the challenges presented by the current pandemic have  
4 hindered counsel's ability to make contact with NDOC employees and obtain information for  
5 purposes of preparing NDOC's responsive pleading. Furthermore, NDOC's EEO Officer  
6 recently broke her ankle and is out of the office for three weeks, which has further hindered  
7 counsel's ability to access information needed in preparing NDOC's responsive pleading. These  
8 factors, along with limited staff availability at the Attorney General's Office due to the  
9 pandemic, have made it necessary to request an additional extension of three weeks to prepare  
10 Defendant's response to the Complaint.

11 Upon agreement by and between the parties, through their respective counsel, the  
12 undersigned counsel requests that this Court grant Defendants an additional three weeks  
13 extension of time, up to and including, Thursday, June 18, 2020, to file an answer or motion in  
14 response to Plaintiff's Complaint.

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1 By entering into this stipulation, neither party waives any rights they have under statute,  
2 law, or rule with respect to Plaintiff's Complaint.

3 DATED: May 13, 2020

4 AARON D. FORD  
5 Attorney General

6 By: /s/ Kevin A. Pick  
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*Attorneys for Plaintiff Mardelle Petersen*

17 **ORDER**

18 IT IS SO ORDERED.

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20 UNITED STATES MAGISTRATE JUDGE

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22 Dated: May 14, 2020.  
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